

March 23, 2009

Ms. Laura Sinram
Senior Campaign Finance Analyst
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Ms. Sinram:

The National Republican Congressional Committee (FEC ID# C0075820) is in receipt of your Request for Additional Information dated February 20, 2009 regarding our 2008 30 day Post-General FEC report.

Your letter indicates that the Committee disclosed in-kind, independent and coordinated expenditures for the same candidates or the opponents of those candidates. The Committee complied with all rules and regulations regarding independent expenditures. Committee staff working on independent expenditures are not permitted to have contact about their work with the campaigns, regular Committee staff, or Committee leadership. The filings are correct as filed and meet the standard established by the Commission and the courts.

On 1/30/09, the Committee refunded \$ 2,000 to Ann Haggerty and \$ 22,650 to John C. Wells. These refunds were disclosed on the February monthly report filed 2/19/09.

For Schedule B Line 23 on the post-general report, we have amended certain in-kind memo entries to reflect that they are primary 2010 in-kinds. All in-kinds noted for the 2008 general took place on or before November 4, 2008, but certain bills were received and payment was made after the election.

With respect to your inquiry regarding contributions made to "Ken Calvert for Congress" and "Stivers for Congress" and designated for the 2008 recount in California's 44th Congressional District and Ohio's 15th Congressional District, respectively, we are reviewing the status of the recount funds and our contributions made to the funds, and we will provide you with additional information once we have reviewed all available information.

The Committee has amended its September 2008 monthly report to reflect that the donation to Lynn Jenkins for Congress for \$ 5,000 was for primary debt retirement, and the \$ 4,000 was for the general election. There is thus no excessive contribution to this campaign.

The National Republican Congressional Committee was authorized to make coordinated expenditures on behalf of Wayne Parker, Jr. by both the Republican National Committee and the Alabama Republican Party; on behalf of Thomas McClintock by both the Republican National Committee and the California Republican Party; on behalf of David Cappiello by both the Republican National Committee and the Connecticut Republican State Central Committee; on behalf of William T. Sali by both the Republican National Committee and the Idaho Republican Party; on behalf of Anne Northup by both the Republican National Committee and the Republican Party of Kentucky; on behalf of Joseph K. Knollenberg by both the Republican National Committee and the Michigan Republican Party; on behalf of Lee Terry by both the Republican National Committee and Nebraska Republican Party; on behalf of Chris Meyers, Scott Garrett, and Leonard Lance by both the Republican National Committee and the New Jersey Republican State Committee; on behalf of Dean Heller by both the Republican National Committee and the Nevada Republican State Central Committee; on behalf of John Kuhl by both the Republican National Committee and the New York Republican Federal Campaign Committee; on behalf of Steve Chabot and Jeanette Schmidt by both the Republican National Committee and the Ohio Republican Party State Central Committee; on behalf of William Russell by both the Republican National Committee and the Republican Federal Committee of Pennsylvania; and on behalf of Virgil H. Goode, Jr. and Keith Fimian by both the Republican National Committee and

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the Republican Party of Virginia. Therefore, there are no excessive coordinated expenditures with respect to these candidates. However, the FEC's electronic filing software permits only one authorizing committee to be listed.

The National Republican Congressional Committee was authorized to make coordinated expenditures on behalf of Representative Dave Reichert by both the Republican National Committee and the Washington State Republican Party. However, the FEC's electronic filing software permits only one authorizing committee to be listed.

The Committee has requested a refund from the Friends of Dave Reichert in the amount of \$ 1,087.88.

The amended post-general report corrects the memo-entries for in-kind blast fax and in-kind studio time, which now correspond to the amounts on line 23 reflected as payments to Verizon and the Republican National Committee, respectively.

The amended post-general report reflects aggregate coordinated expenditures totals on Schedule F of \$ 83,200 for Anne Northup, and of \$ 85,287.88 for Dave Reichert, as indicated in your letter.

The line 15 receipts referenced in your letter from Buckeye Liberty PAC resulted from payments to Verizon (and we have amended the report to reflect the change in the description of this entry). The reimbursements from Friends of Joe Pitts, Kuhl for Congress, Mike Rogers for Congress, and People for English result not from expenditures to these entities, but from payments made to Whitaker Askew. The receipt from Lindsay H. Martin is for COBRA, and the original insurance payment was made to MAMSI.

With regard to the listing of "Missing 48 Hour Notice" (Schedule E), the 24-hour notices were filed based on the dissemination date (the date the disbursements qualified as independent expenditures). Specifically, the payment of \$ 8,559 to Stevens Reed Curcio and Potholm was disclosed on a 24-hour notice filed on 10/24/08. The payment of \$ 22,296 to Campaign Tel qualified as independent expenditures on different dates (based on the days the phone calls were made), and the appropriate 24-hour notices were filed on 12/2 (\$ 2,091.55), 12/4 (\$ 2,122.85), and \$ 12/5 (\$18,711.60). The payment of \$ 23,949 to The Innovative Agency was disclosed on a 24-hour notice filed on 10/22/08. The payment of \$ 16,216.06 to The Hopper Company was disclosed on a 24-hour notice filed on 10/24/08. The payment of \$ 21,753.99 to Targeted Creative Communications, Inc. was disclosed on a 24-hour notice filed on 10/24/08. Finally, there were two payments of \$ 33,160 on 10/21/08 (with respect to Glenn Carlyle Nye III) to The Innovative Agency, LLC, which were disclosed on separate 24-hour notices filed on 10/23/08 and 10/24/08, respectively.

Your letter references contribution refunds issued to 32 individuals. In each case, the individual contributor did not exceed \$ 200 in the yearly aggregate, and thus the original contributions were not (and were not required to be) itemized on any Schedule A. We itemized these contribution refunds (which were all in amounts of \$ 200 or less) as a voluntary disclosure.

The amended report filed today reflects the two in-kind donations (\$8,000 and \$3,500) listed as disbursements but inadvertently omitted from the itemized receipts on Schedule A line 11c. The amounts were correctly included in total overall receipts on the original report.

The Committee has reviewed all reimbursements to individuals for travel and subsistence and can as you requested confirm that no further itemization is required under any Commission regulations for these expenditures.

The void check (\$ 12,000) to Baseline and Associates was reissued for the correct amount of \$ 6,000 on 10/20/08. The void check (\$ 1,500) to Malibu Management Services was not reissued because the event was cancelled. The void check (\$ 24,000) to McLaughlin & Associates was reissued on 10/21/08. The void check (\$ 838) to Smart Source Rentals was reissued on 11/18/08. The void check (\$ 317.39) to Third Dimension Strategies was reissued on 11/18/08. All the reissued checks were reported.

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We have filed an amended post-general report to include the missing purposes of disbursement inadvertently omitted from the original filing.

The Committee reported on Schedule E disbursements to Arena Communications, Ayres McHenry and Associates, Baselice and Associates, Inc., Campbell Holste, Comtech Design Print and Mail, Crossroads Media LLC, Majority Strategies, McLaughlin and Associates, Inc., Media Ad Ventures, Inc., Mentzer Media Services, Inc., National Research, Inc., Orman Communications, Polling Associates, Public Opinion Strategies, Revolution Media Group, Sandler-Innocenzi, Inc., Scott Howell and Company, LP, Stevens Reed Curcio and Potholm, Strategic Media Placement, Targeted Creative Communications, Inc., The Hopper Company, The Innovative Agency LLC, The Stoneridge Group LLC, The Strategy Group for Media, Inc., and The Tarrance Group as of the date of the expenditures. Once the expenditures qualified by date of dissemination as an independent expenditure, the required 48-hour Schedule E notice was then filed within the appropriate timeframe. Therefore, no amendment is necessary with respect to these disbursements.

The payments referenced in your letter for Catering, Facility Rental, Fundraising Consulting, Fundraising Phone Calls, Media, Photography Svc, Postage, Postage/Printing, Printing and Printing/Postage were operating and administrative payments solely benefiting and on behalf of the National Republican Congressional Committee. As such, they were not made on behalf of any specifically identified federal candidates, nor did they constitute public communications or voter drive activity containing express advocacy. Therefore, these disbursements are as you noted correctly reported on Schedule B for Line 21b, and do not require a Schedule B, Schedule E, or Schedule F for lines 23, 24 or 25.

The Committee has filed an amended Form 1 to list PNC Bank as a depository.

Sincerely:

Keith A. Davis, Treasurer
National Republican Congressional Committee